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Filed : October 29, 2003

## REMARKS

Claims 1-29 are currently pending, with Claims 23-26 being withdrawn.

### **Rejections Under 35 U.S.C. §103**

Claims 1-4, 6, 7, 18-20, and 27-29 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sherstinsky et al., U.S. Patent No. 6,464,790, in view of Yudovsky et al. Claims 5, 8-17, 21, and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sherstinsky et al. in view of Yudovsky et al., and further in view of Goodman, U.S. Publication No. 2003/0198910. Applicants respectfully disagree that Claims 1-4, 6, 7, 18-20, and 27-29 are unpatentable over Sherstinsky et al. in view of Yudovsky et al., and that Claims 5, 8-17, 21, and 22 are unpatentable over Sherstinsky et al. in view of Yudovsky et al, and further in view of Goodman, and Applicants respectfully traverse the rejections.

Applicants respectfully submit that the Examiner has not established a *prima facie* case of obviousness. The Examiner points to the raised portions 52, 56, 58 of Sherstinsky et al., which are annular rings, as the recited support element, but notes that “Sherstinsky et al. do not teach that the annular ring is a veined ring” that “is composed of a plurality of veins substantially angled with respect to a radial direction.” The Examiner asserts that “it would have been obvious to one of ordinary skill in the art at the time of the invention to provide angled veins on the surface of support element[s] (annular raised portions 52, 56) as taught by Yudovsky et al. in the apparatus of Sherstinsky et al. to control the delivery of purge gas to the edge of [the] substrate during processing.” Applicants respectfully submit that the skilled artisan would not have been motivated to provide the Sherstinsky et al. apparatus with an annular veined ring because Sherstinsky et al. teach away from providing an annular veined ring. Sherstinsky et al.’s express goal is to provide an improved substrate support for vacuum adhesion of a substrate thereon. See Sherstinsky et al., at col. 1, lines 12-14; col. 3, lines 23-24 and 46-47; col. 5, lines 28-36; col. 6, lines 6-9. Sherstinsky et al. teach that the raised portions 52, 56, 58 are “continuous annular rings” that “define isolated cavities which are enclosed by a substrate to effectively seal the cavities from the processing environment.” Sherstinsky et al., at col. 6, lines

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2-6. Thus, Sherstinsky et al. teach to provide defined cavities that are isolated from the processing environment by sealing these cavities from the processing environment with continuous annular rings 52, 56, 58. An annular veined ring would not be capable of defining an isolated cavity that is enclosed by a substrate because the spaces between the veins would allow gases to pass therethrough and would therefore not effectively seal the cavity from the processing environment. Accordingly, an annular veined ring would defeat the very purpose of Sherstinsky et al., which is to provide an improved substrate support for vacuum adhesion of a substrate thereon. Sherstinsky et al. therefore teach away from providing an annular veined ring. It would not have been obvious for the skilled artisan to provide the Sherstinsky et al. with an annular veined ring, as disclosed in Yudovsky et al.

As discussed above, skilled artisans would not have been motivated to modify Sherstinsky et al. to have an annular veined ring (as recited in independent Claim 1), a plurality of spaced veins configured in an annular ring (as recited in independent Claim 12), a plurality of veins substantially angled with respect to a radial direction (as recited in independent Claim 18), or an annular ring of veins substantially angled with respect to a radial direction (as recited in independent Claim 27). As noted above, such modifications of the Sherstinsky et al. apparatus would defeat Sherstinsky et al.'s goal of vacuum adhesion of a substrate.

Independent Claims 1, 12, 18, and 27 are therefore patentable, as they are not obvious over the cited references, either alone or in combination. Without acquiescing in the Examiner's reasons for rejection, Applicants submit that Claims 2-11, 13-17, 19-22, and 28-29 are all allowable at least because they depend from and include all of the limitations of Claim 1, 12, 18, or 27, each of which is patentable, as discussed above. Furthermore, each of the dependent claims recites additional features of advantage and utility.

### **Conclusion**

Applicants respectfully submit that all of the pending claims are patentably distinguishable over the art of record references. The cited references, either alone or in combination, do not teach or suggest Applicants' claimed invention.


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Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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